

RAYMOND NARDO, P.C.

ATTORNEY AT LAW

129 THIRD STREET, MINEOLA, NY 11501

Phone: (516)248-2121 | Fax: (516)742-7675 | Email Raymondnardo@gmail.com

November 1, 2022

BY ECF

Hon. Joan M. Azrack
United States District Judge
United States District Court
100 Federal Plaza
Central Islip, NY 11772

Re: Tanza v. Garda Security
15-CV-04394(JMA)(AYS)

Honorable Judge Azrack:

I represent Frank & Associates P.C. (“Frank”) in the above matter. I recently became aware of the October 20, 2022 letter, with an attachment, sent to Your Honor, but I was not notified in real time because I was not on the docket, which has since been remedied.

As you know, Neil Frank, Esq. is no longer practicing law, and I represent his fee interests in this case. On August 17, 2022, I forwarded Frank’s timesheets and expenses to Kyle Pulis, Esq. of Scott Michael Mishkin’s office (“Mishkin”). Subsequently, the parties negotiated a resolution concerning the apportionment of counsel fees, subject to Your Honor’s approval. Today, I forwarded Frank’s timesheets and expenses to Defendants. Had they requested same from my office, as counsel for Frank, I would have furnished them upon request.

Please note that there is no issue with Neil Frank’s “disbarment,” since the latest entry on his timesheet is April 5, 2019, and the disbarment occurred on April 21, 2019. All services were performed by Frank while he was an attorney in good standing.

On behalf of Frank, I request that the Addendum to Settlement Agreement and Release not be approved as to the Attorneys’ Fees and Cost Amounts since Frank was not consulted, he has produced records, and it does not reflect the fee and cost agreement between Frank and Mishkin, which is subject to Court approval. On behalf of Frank, I join in the Joint Motion for a conference concerning this matter.

Thank you for your consideration.

Respectfully submitted,



RAYMOND NARDO, ESQ.

RN:rn

cc: Counsel of Record by ECF